

- D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE:

The incident in which sexually explicit and pornographic activity caused Plaintiffs' injuries and is the basis of this lawsuit occurred in Charleston County which is proper to this Division and Court. Plaintiffs reserve the right to supplement this response.

- E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE:

This action is not related to any other actions known to the undersigned filed in this District.

- F) [*Defendants only.*] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE:

Not applicable.

- G) [*Defendants only.*] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE:

Not applicable.

- H) *Parties or Intervenor in a Diversity Case.* In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

RESPONSE:

<u>PARTIES</u>	<u>CITIZENSHIP</u>
Plaintiffs: Brooke & Tory Brewer and their minor children	Charleston County, SC
Defendant: Delta Airlines, Inc.	Fulton County, GA
Defendant: Unifi Services	Fulton County, GA

Respectfully submitted this the 16th day of July 2025.

MOTLEY RICE LLC

By: s/ Mary Schiavo
Mary Schiavo (SC Fed Bar No. 10755)
James R. Brauchle (SC Fed Bar No. 8014)
Olutola Familoni (SC Fed Bar No. 103539)
28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
Tel: (843) 216-9000
Fax: (843) 216-9450
mschiavo@motleyrice.com
jbrauchle@motleyrice.com
tfamiloni@motleyrice.com

COUNSEL FOR PLAINTIFFS